

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

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U.S. DISTRICT COURT
N.D. OF ALABAMA

UNITED STATES OF AMERICA

-v-

ERIC ROBERT RUDOLPH

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) CR 00-S-422-S
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)

JOINT MOTION TO CONTINUE DETENTION HEARING

Comes Now the United States of America by and through its counsel, Alice H. Martin, United States Attorney for the Northern District of Alabama and William R. Chambers, Jr., and Robert Joe McLean, Assistant United States Attorneys, and William Bowen and Richard Jaffee, counsel for Eric Robert Rudolph and respectfully Moves this Honorable Court to Continue the Detention Hearing presently set before this Court on June 10, 2003, at 2:00pm. In support of this Motion to Continue, undersigned counsel submit the following:


As this Court is aware, this case involves an extremely large amount of documents, reports, interviews, statements, laboratory reports and documentary and physical evidence. The review alone of this case and items collected in the investigation will require both extraordinary effort and additional time. The assimilation of this information by the prosecution and the defense will be an even more time consuming job. Undersigned defense counsel have just begun reviewing materials provided by the United States pursuant to Rule 16 and cannot, at this point, adequately make use of the materials provided and to be provided in addressing the issue of detention. Undersigned counsel submit that the interests of justice are served by a continuance in the detention hearing to permit defense counsel to conduct a more thorough review of the facts and evidence in this case as they relate to the issue of detention in order to be adequately

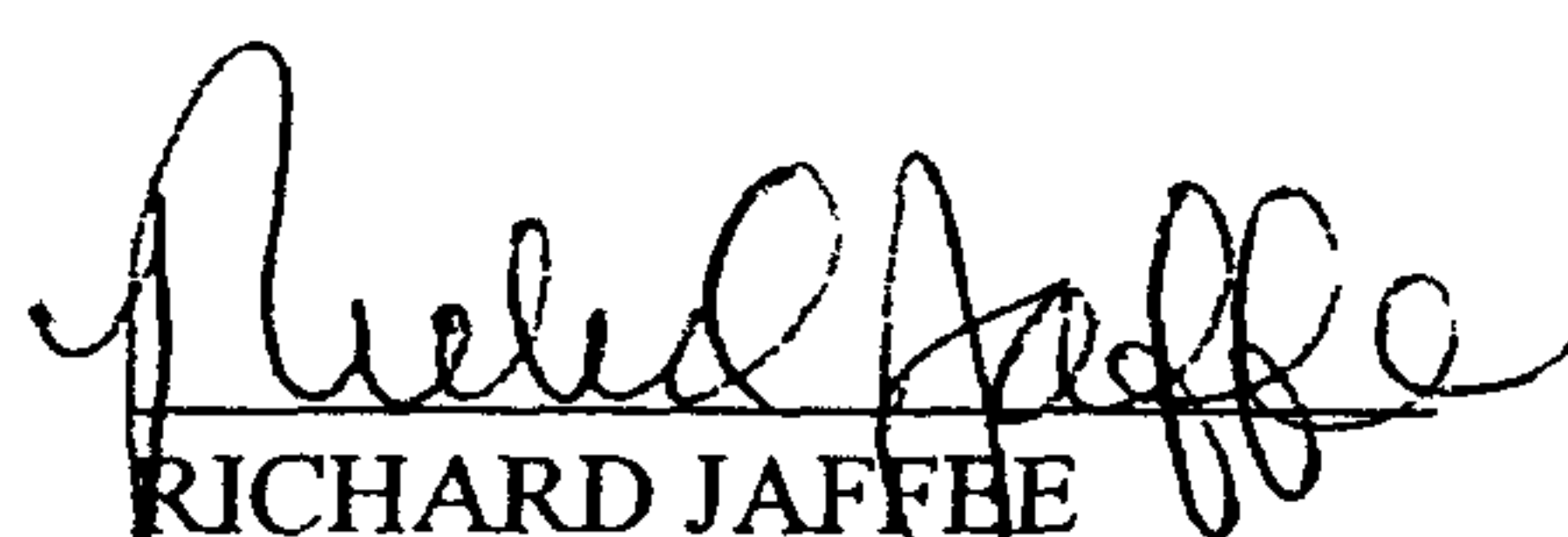
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prepared in addressing that issue before this Court.

Undersigned counsel are aware of the time constraints imposed on the Court and the parties under the Bail Reform Act, Title 18, United States Code, Section 3142(f)(2) and hereby waive any and all objections, motions, claims, and/or defenses based on the delay in holding the detention hearing in this case. Counsel for the United States specifically joins in this Motion to Continue as the interests of justice, the interests of the defendant and the United States will be served by the granting of a continuance to permit more adequate review of the facts and evidence in this case and adequate preparation by the defense to address the issue of detention before this Court.

Respectfully submitted this the 9th day of June, 2003.


WILLIAM BOWEN
Counsel for Eric Robert Rudolph


RICHARD JAFFEE
Counsel for Eric Robert Rudolph

ALICE H. MARTIN
United States Attorney


ROBERT JOE McLEAN
Assistant United States Attorney


WILLIAM R. CHAMBERS, JR.
Assistant United States Attorney